



**CANTON DROP FORGE**

MAY 08 2013



ISO 9001 and AS 9100  
Certified Quality System

May 2, 2013

Carol Staniec  
Acting Chief  
Compliance Section 2  
RCRA Branch  
United States Environmental Protection Agency  
Region 5  
77 West Jackson Boulevard  
Chicago, IL 60604-3590

Re: Request for Information  
EPA ID No.: OHD004465142

Dear Ms. Staniec:

Documents requested by EPA are enclosed with this Response. Documents are indexed to these responses by placement of the numbered question in the upper right hand corner of the document. For drawings and maps, the numbered question is placed on the Legend for the drawing or map.

REQUEST:

1. In the Response, Section A of NOV Item 2 states that the existing oil-water separator at the south end of Forge Shop Building C was originally equipped with coalescing mesh filters. Due to the significant amount of grit in the oil and process water entering the separator, the filter became plugged and was removed.
  - a. State the date of installation of the existing oil-water separator at the south end of Forge Shop Building C.

RESPONSE:

- 1a. 1/17/1996.
- b. State the date that the coalescing mesh filter was removed from the existing oil-water separator.

RESPONSE:

- 1b. The last coalescing filter media were purchased from AFL Industries on 7/2/2003. The filter media were removed some time after July, 2003, but CDF has not yet been able to verify when. CDF is continuing its efforts to determine the date.
- c. Since the date the original mesh filter was removed, has CDF made any attempts to reinstall the mesh filter in the oil-water separator or to find an alternative method to prevent used oil from entering Ponds #1 and #2? If so, please explain all such attempts and provide corresponding documents.

RESPONSE:

- 1c. Yes. In 1996, CDF installed an Oil Skimmer brand oil skimmer on top of the existing oil water separator to remove oil from the separator as it was collected at the vertical tube coalescer prior to the oil retention baffle. Please also see the enclosed documents referencing this Response 1c.
- d. Please provide the design specifications and capacity (and all corresponding documents) of the existing oil-water separator.

RESPONSE:

- 1d. Please see the enclosed documentation for the design specifications and capacity (120 gpm) of the existing oil-water separator. The enclosed Mack Industries Specifications for this oil/water separator provides detailed information concerning design, capacity, and operating parameters.
- e. Please provide all documents used to determine the necessary design specifications and capacity of the existing oil-water separator.

RESPONSE:

- 1e. Please see the enclosed documents, including the FBA Environmental report discussing two, five and ten-year rain fall events, surface water runoff quantities and oily process wastewaters and condensates, plus the Industrial Pretreatment System report dated 1995 by Hammontree & Associates.

- f. Please provide a copy of any regulatory document obtained from the state or local municipality on the design, specification, installation and operation of the existing oil-water separator.

RESPONSE:

- 1f. After a diligent search, no regulatory documents were located from the state or local municipality related to the oil water separator design, specification, installation or operation.

REQUEST:

2. In the Response, Section B of NOV Item 2 states that Complete Waste Disposal was contracted to remove the existing used oil from Pond #1. Between August 3 and September 20, 2012, Complete Waste Disposal removed 49,300 gallons of used oil and water from the pond over the course of eight shipments.

- a. Please provide copies of the eight waste manifests used to ship the used oil from CDF's site to Environmental Specialists for recycling.

RESPONSE:

- 2a. Please see the enclosed eight manifests.
- b. Please provide all documents of studies and/or plans for the removal used oil from Ponds #1 and #2, and all documents describing the actions taken to remove oil from Pond #1.

RESPONSE:

- 2b. Please see the enclosed quote from Complete Waste Disposal, Inc. dated 9/18/2012, plus other documents marked 2b. relating to studies, plans, remediation, and communications concerning removal of oil from ponds 1 and 2.
- c. CDF also states that used oil from Pond #2 will be removed in a similar fashion as Pond #1. Please provide a tentative date when CDF plans to remove the used oil from Pond #2.

RESPONSE:

- 2c. Please see the enclosed TRC draft Remedial Action Plan under the Ohio Voluntary Action Program. Under the proposed Plan,

remediation of Pond 2, including any oil, will be completed in the 2013 construction season.

REQUEST:

3. In the Response, Section C of NOV Item 2 states that since August 2012 "substantial efforts have been performed to determine current site conditions and to define a remedy to improve oil-water separation and oil reclamation in order to prevent oil from reaching any of the on-Site ponds." CDF further states that these efforts included engaging TRC Environmental Corp. (TRC) to "perform an engineering study for process and storm water improvements and to develop storm water best management practices."
- a. Please provide all final and (if not yet finalized) draft determinations, studies, and/or reports as described above, and all documents provided by CDF to TRC to undertake any of the above described efforts.

RESPONSE:

- 3a. These documents are enclosed.
- b. If not included in the above requested documents, for the time period of January 2005 to the present, please provide detailed description(s) (and corresponding documents) by which each used oil stream enters either Pond #1 or #2, including the location(s), time(s), and quantities the used oil is generated to the location(s) and time(s) and quantities that the used oil enters either Pond #1 or Pond #2.

RESPONSE:

- 3b. CDF does not have a written record of storm events that caused overflows of oil from the oil/water separator into Pond 1 or Pond 2.
- c. If not provided above, for the time period of January 2005 to the present, please provide detailed description(s) (and corresponding documents) on how CDF manages the used oil entering either Pond #1 or Pond #2, including directing used oil to either Pond #1 or Pond #2, transferring water containing used oil from Pond #1 to Pond #2, and skimming used oil from Pond #1 and Pond #2.

RESPONSE:

- 3c. The documents pertaining to oil use, the operation of the oil/water separator, and corrective measures are enclosed.

REQUEST:

4. In the Response, Section D of NOV Item 2 states that TRC completed a Draft VAP Phase I and Draft Phase II Property Assessment in November 2012. The draft reports included the collection of soil, groundwater, sediment and surface water samples.
  - a. Please provide a copy of the Draft Phase I Property Assessment completed by TRC, including copies of all documentation utilized to meet the requirements of a Phase I Property Assessment found in OAC 3745-300-06.

RESPONSE:

- 4a. The TRC documents are enclosed.
- b. Please provide a copy of the Draft Phase II Property Assessment completed by TCR, including copies of all documentation utilized to meet the requirements of a Phase II Property Assessment found in OAC 3745-300-07.

RESPONSE:

- 4b. The TRC documents are enclosed.

REQUEST:

5. The Response to NOV Item 3 cites a 1995 report by Hammontree & Associates, Limited in which the oily sludge lining Pond #2 was sampled for TCLP VOCs, TCLP SVOCs, TCLP PCBs, TCLP metals, reactive cyanide, reactive sulfur, flash point, pH, paint filter, PCBs and TPH.
  - a. Please provide a copy of that report including all analytical results for the constituents mentioned above.

RESPONSE:

5. The 1995 Hammontree & Associates' reports for Pond 1 and Pond 2 are enclosed.

- b. Please explain all reasons and purposes of CDF's engagement of Hammontree & Associates to complete this report (including all corresponding documents).

RESPONSE:

5. The 1995 Hammontree & Associates' reports for Pond 1 and Pond 2 are enclosed.

REQUEST:

6. If not provided in response to a request above, please provide a map of the entire Canton Drop Forge property, including the precise boundaries (prior and present) of the Zone A and Zone B landfills as well as Ponds #1, #2, and #3.

RESPONSE:

6. A number of maps and drawings of the facility, the ponds, and Zone A and Zone B are enclosed.

REQUEST:

7. Please provide all information and documentation that describes if, at any point in CDF's operating history, waters from Ponds #1, #2, and #3 were ever discharged from CDF's property to the Massillon County publicly owned treatment works or any local waterway.

RESPONSE:

7. During CDF's operating history, there have been no discharges from pond #1 or #2 to the Massillon County POTW or any local waterway. Interviews of past and present employees have described an event in the early 1970's when water from Lagoon #3 overflowed to Southway Street, but no documents have been located relating to this event.

REQUEST:

8. If not provided in response to any of the above requests, please provide a detailed description and corresponding documents of how Ponds #1 and #2 previously and currently comply with RCRA's hazardous waste surface

impoundment requirements, as set by the Ohio Administrative Code and the Code of Federal Regulations, including any draft or submitted RCRA permit applications.

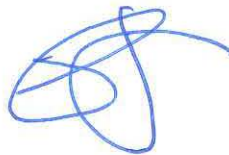
RESPONSE:

8. RESPONSE: The facility ponds are not and have not been hazardous waste surface impoundments and therefore were not required to comply with federal or state hazardous waste surface impoundment regulations.

Certification

I certify under the penalty of law that I have examined and am familiar with the information submitted in responding to this information request for production of documents. Based on my review of all relevant documents and inquiring of those individuals immediately responsible for providing all relevant information and documents, I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Sincerely,



Enclosures

cc: Natalie Oryshkewych, OEPA — Northeast District Office  
(Natalie.oryshkewych@epa.state.oh.us)

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